LPDES PERMIT NO. LA0001350, AI No. 671

LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

Company/Facility Name:	Targa Louisiana Field Services, LLC Gillis Gas Processing Plant 3807 Luke Powers Road Lake Charles, LA 70615
Issuing Office:	Louisiana Department of Environmental Quality (LDEQ) Office of Environmental Services (Office) P. O. Box 4313 Baton Rouge, LA 70821-4313
Prepared By:	Gene Jarreau Level 1 Industrial Permits Section Water Permits Division Phone #: (225) 219-3080 E-Mail: Gene.Jarreau@la.gov
Date Prepared:	July 23, 2009

I. Permit Action/Status:

Reason For Permit Action:

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

A. LPDES permits - Individual LPDES Permit
LPDES permit effective date: November 1, 2003
LPDES permit expiration date: October 31, 2008

LPDES permit minor modification effective date:
April 16, 2004
General LPDES Permit Authorization LAG679013
LPDES permit authorization effective date: February 1, 2008
LPDES permit authorization expiration date: January 31, 2013

B. Application received on November 26, 2008. Revised Application received on March 3, 2009. Additional information received via e-mail on June 16, 2009, July 21, 2009, and July 22, 2009.

II. Facility Information:

A. Location - 3807 Luke Powers Road, Lake Charles, Calcasieu Parish.
Latitude 30°16'49", Longitude 93°09'43"

B. Applicant Activity -

According to the application, Targa Louisiana Field Services, LLC, Gillis Gas Processing Plant, is a natural gas processing plant. This facility receives unpurified natural gas from their company's gas gathering system / offshore. Natural gas liquids are recovered from the gas. Purified natural gas (mainly methane) from the facility is delivered to the pipeline. The source of water supply for the facility is well water (approximately 10,000 gallons per day).

Hydrostatic test and vessel testing wastewater at this facility may be discharged using General LPDES Permit Authorization LAG679013.

C. Sources of technology based limits:
Current Permit (effective November 1, 2003)
General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004)
LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA)
LDEQ Sanitary Discharge General Permits
Current practices regarding treated sanitary wastewater discharges in individual permits
Best Professional Judgment (BPJ)
Light Commercial Facilities General Permit LAG480000

D. Fee Rate -
i) Fee Rating Facility Type: Minor
ii) Complexity Type: II
iii) Wastewater Type: III
iv) SIC Code: 1321

E. Continuous Facility Effluent Flow – 0 GPD

III. Receiving Waters: Coon Gully, thence into English Bayou

A. River Basin: Calcasieu River, Segment No. 030702
B. Designated Uses:
The designated uses are primary contact recreation, secondary contact recreation, fish and wildlife propagation, and agriculture.
C. TSS (15%), mg/L: 8
D. Average Hardness, mg/L $CaCO_3$: 91.2
E. Critical Flow, cfs: 0.1

Information based on the following: Recommendation(s) from the Engineering Section. For permit limit calculations, the default harmonic mean flow value of 1.0 cfs should be utilized. No Mixing Zone Fraction was given/needed for this water quality scan. Hardness and (15%) TSS data come from ambient site number 131 (English Bayou at the bridge on US Highway 171, 1.0 mile upstream from the Calcasieu River, 4.0 miles northeast of the city of Lake Charles) and ambient site number 841 (English Bayou north of Chloe', Louisiana, on a Highway 397 bridge, 0.5 miles north of Chloe', 5.0 miles southeast of Morgan Bluff, 3.5 miles northeast of Lake Charles). This information was presented in a memorandum from Todd Franklin to permit writer, dated July 16, 2009 (See Appendix A).

IV. Outfall Information:

Outfall 001

A. Type of wastewater – the intermittent discharge of treated sanitary wastewater (from Internal Outfall 101), cooling tower blowdown, process and non-process area stormwater, equipment washwater, eye wash solutions, and safety shower wastewater.

B. Location – at the point of discharge from the settling pond in a series of three on the west side of the facility, prior to combining with the waters of Coon Gully, at Latitude 30°16'25", Longitude 93°09'35".

C. Treatment – Settling Ponds

D. Flow - Intermittent, 499 GPD

E. Receiving waters – Coon Gully (via effluent pipe), thence into English Bayou.

F. Basin and segment - Calcasieu River Basin, Segment No. 030702.

Outfall 002

A. Type of wastewater – the intermittent discharge of non-process area stormwater.

B. Location - at the point of discharge from the single retention pond designated strictly for non-process area stormwater, on the west side of the facility,

prior to combining with the waters of Coon Gully, at Latitude 30°16'51", Longitude 93°09'22".

C. Treatment – None

~~D. Flow - Intermittent, 57 GPD~~

E. Receiving waters – Coon Gully (via ditch), thence into English Bayou.

F. Basin and segment - Calcasieu River Basin, Segment No. 030702.

Internal Outfall 101

A. Type of wastewater – the intermittent discharge of treated sanitary wastewater.

B. Location – at the point of discharge from the treatment plant, prior to combining with any other waters routed to Outfall 001, at Latitude 30°16'25", Longitude 93°09'35".

C. Treatment – Mechanical (Package Treatment Units)

D. Flow - Intermittent, 600 GPD

E. Receiving waters – through final Outfall 001 (via effluent pipe), thence into Coon Gully (via effluent pipe), thence into English Bayou.

F. Basin and segment - Calcasieu River Basin, Segment No. 030702.

V. Proposed Changes from Current Permit:

Summary of proposed changes from the current LPDES permit:

Outfall 001

Remove Toxicity as an effluent characteristic, since cooling tower blowdown discharges are less than 100,000 gallons per day. This is consistent with this Office's current guidance on cooling tower blowdown discharges.

The Total Residual Chlorine (TRC) reporting requirement has been replaced with a 0.5 mg/L daily maximum Free Available Chlorine discharge limitation. This is consistent with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004).

A daily maximum discharge limitation of 125 mg/L for COD has been added to this outfall. This requirement has been added due to the commingling of equipment washwater with stormwater, and is consistent with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004).

TDS monitoring and reporting requirements have been added due to the TDS impairment in Subsegment 030702, since TDS is known to be present in cooling tower blowdown. These requirements are established based on BPJ, and will be used to gather data for possible future TMDL development.

Total Chromium and Total Zinc discharge limitations and monitoring requirements have been removed. According to correspondence with Company, there are no plans to use cooling tower blowdown additives containing chromium and/or zinc.

Internal Outfall 101
~~Weekly Average Discharge Limitations have been changed to Daily Maximum Discharge~~ Limitations, in accordance with current practices regarding treated sanitary wastewater discharges in individual permits. The Oil and Grease discharge limitations and monitoring requirements will be removed, for discharges do not include food service waste.

VI. Permit Limit Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

A. **Outfall 001** - the intermittent discharge of treated sanitary wastewater, (from Internal Outfall 101), cooling tower blowdown, process and non-process water, area stormwater, equipment washwater, eye wash solutions, and safety shower wastewater.

This discharge shall be limited and monitored by the permittee according to the following schedule:

PARAMETER	MONTHLY AVERAGE	DAILY MAXIMUM	MONITORING FREQUENCY
Flow	Report (GPD)	Report (GPD)	1/month
TDS	NA	Report (mg/L)	1/month
TOC	NA	50 (mg/L)	1/month
COD	NA	125 (mg/L)	1/month
Oil & Grease	NA	15 (mg/L)	1/month
Free Available Chlorine	NA	0.5 (mg/L)	1/month
pH	6.0 - 9.0 s.u. (Min – Max)		1/month

Site-Specific Consideration(s)

Flow - Established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be estimated once a month. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

TDS – Reporting requirements are established based on BPJ at a frequency of once a month. These monitoring and reporting requirements have been added due to the TDS impairment in Subsegment 030702, since TDS is known to be present in cooling tower blowdown. Reporting requirements will be used to gather data for possible future TMDL development. These requirements have been added to the ~~previous LPDES permit, effective on November 1, 2003.~~

TOC - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

COD - Effluent limitations are established in accordance with BPJ, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and Schedule B of the Light Commercial Facilities General Permit LAG480000, at a frequency of once a month. Due to the commingling of equipment washwater with stormwater, these requirements have been added to the previous LPDES permit, effective on November 1, 2003.

Oil and Grease - Effluent limitations are established in accordance with BPJ, the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

Free Available Chlorine – Effluent limitations are established due to the use of cooling tower blowdown additives containing chlorine at this outfall. These requirements are consistent with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and have been applied based on BPJ. The frequency has been established at once a month. These requirements have changed from the previous LPDES permit, effective on November 1, 2003.

pH – Effluent limitations are established in accordance with LAC 33:IX.1113.C.1, and are consistent with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), at a frequency of once a month. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

B. **Outfall 002** - the intermittent discharge of non-process area stormwater.

This discharge shall be limited and monitored by the permittee according to the following schedule:

PARAMETER	MONTHLY AVERAGE	DAILY MAXIMUM	MONITORING FREQUENCY
Flow	Report (GPD)	Report (GPD)	1/quarter
TOC	NA	50 (mg/L)	1/quarter
Oil & Grease	NA	15 (mg/L)	1/quarter
pH	6.0 - 9.0 s.u. (Min – Max)		1/quarter

Site-Specific Consideration(s)

Flow - Established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be estimated once a quarter. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

TOC - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

Oil and Grease - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

pH – Effluent limitations are established in accordance with LAC 33:IX.1113.C.1, and are consistent with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a quarter. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on November 1, 2003.

C. **Internal Outfall 101** - the intermittent discharge of treated sanitary wastewater.

This discharge shall be limited and monitored by the permittee according to the following schedule:

PARAMETER	MONTHLY AVERAGE	DAILY MAXIMUM	MONITORING FREQUENCY
Flow	Report (GPD)	Report (GPD)	1/6 months
BOD_5	NA	45 (mg/L)	1/6 months
TSS	NA	45 (mg/L)	1/6 months
Fecal Coliform	NA	400 (colonies/ 100 ml)	1/6 months

Site-Specific Consideration(s)

Weekly Average Discharge Limitations have been changed to Daily Maximum Discharge Limitations, in accordance with current practices regarding treated sanitary wastewater discharges in individual permits. These requirements have changed from the previous LPDES permit, effective on November 1, 2003.

Flow - Established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be estimated once every six months.

BOD_5 and TSS - Effluent limitations are established in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), current practices regarding treated sanitary wastewater discharges in individual permits (per LAC 33:IX.2709.D), LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD_5 and TSS in terms of concentration. The monitoring frequency is once every six months.

Fecal Coliform - Effluent limitations are established in accordance with current practices regarding treated sanitary wastewater discharges in individual permits (per LAC 33:IX.2709.D), the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004), LAC 33:IX.711 or 709.B, by BPJ utilizing the sanitary general permits issued by this Office, and the Louisiana Water Quality Management Plan, Volume 8, Appendix A (Areawide Policies), as applicable. The monitoring frequency is once every six months.

VII. Water Quality-Based Effluent Limitations:

Analytical results from the permittee's application were screened against state water quality numerical standards using the guidance procedures established in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, Water Quality Management Plan, Volume 3, Version 6, LDEQ Office of Environmental Services, April 16, 2008. Calculations and results are given in Appendix B-1, and documentation is given in Appendix B-2. No water quality based effluent limits were established, based upon this specific screen.

VIII. TMDL Waterbodies

Subsegment 030702, English Bayou – Headwaters to Calcasieu River, is listed on LDEQ's Final 2006 303(d) List as impaired for mercury and TDS. Although TMDLs for the Calcasieu River Basin were due to be completed by 2001, TMDLs have not yet been developed for mercury and TDS for this waterbody. TMDLs will be completed following the EPA Consent Decree TMDL schedule. A reopener clause has been established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by future TMDLs.

For mercury and this facility, the types of discharges are not reasonably expected to cause or contribute to further mercury impairments. Therefore, no additional requirements have been added to this permit as a result of this impairment.

For TDS and this facility, monitoring and reporting requirements have been added due to the TDS impairment, since TDS is known to be present in cooling tower blowdown. These requirements are established based on BPJ, and will be used to gather data for possible future TMDL development.

Subsegment 030702 was previously listed as impaired for suspended solids / turbidity on past 303(d) lists, for which the following TMDL has been developed. The LDEQ reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL has been established for subsegment 030702:

English Bayou Turbidity and Suspended Solids – June 13, 2002

As per the TMDL, point sources do not represent a significant source of TSS as defined in this TMDL. Since an enforceable mechanism is in place to protect from discharges of organic suspended solids, no TMDL is required for these materials. TSS limits will remain, if previously permitted.

For suspended solids / turbidity and this facility, these impairments were not determined to be discharged at levels which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard.

Subsegment 030702 was previously listed as impaired for organic enrichment / low DO and nutrients on past 303(d) lists, but these impairments were Delisted officially on June 13, 2002. (TMDLs have been previously received from LDEQ and approved by the U.S. E.P.A.)

IX. Compliance History/DMR Review:

A compliance history/DMR review was done covering the period of July 15, 2006 to July 15, 2009.

A. DMR Exceedances Reported

On August 16, 2006, the weekly average for Fecal Coliform was 2,000 colonies/100ml (limit is 400 colonies/100ml) for Internal Outfall 101, and the weekly average for TSS was 52 mg/L (limit is 45 mg/L) for Internal Outfall 101. On November 30, 2006, the weekly average for Fecal Coliform was >12,000 colonies/100ml (limit is 400 colonies/100ml) for Internal Outfall 101. The cause of this violation stated the system was in need of maintenance. The corrective action stated, as of December 7, 2006, maintenance was done, a contractor's services were obtained to regularly service the system, and additional testing was being conducted in order to correctly identify the source of the problem.

For the monitoring period from July 1, 2007 to December 31, 2007, no samples were taken for Internal Outfall 101. The corrective action stated upon realizing the samples were not taken, the permittee sampled and the TSS was 31 mg/L (limit is 45 mg/L), the BOD was <2 mg/L (limit is 45 mg/L), and the Fecal Coliform was 300 colonies/100ml (limit is 400 colonies/100ml). The permittee attempted to re-sample again on January 14, 2009, but there was no flow.

In August 2007, no samples were taken for Outfall 001. The corrective action stated the permittee set-up a reminder in the electronic calendar to ensure all required samples are collected by the middle of each month, and also confirmed the required sampling schedule with the contract lab that conducts the sampling.

In January 2008, samples were taken for Outfall 001, but were not analyzed by the contract lab. The corrective action stated the permittee confirmed (by the Chain of Custody) samples were taken on January 14, 2008. When the permittee noticed the lab report had not been received, the contract lab confirmed the samples had not been analyzed. The permittee then acquired the services of a different contract lab to conduct future sampling.

On October 9, 2008, the daily maximum for Oil and Grease was 171 mg/L (limit is 15 mg/L) for Outfall 001. The cause of this violation stated the permittee believed this result to be erroneous, for another sample taken that day had an Oil and Grease result of Not Detectable. A re-sample on October 20, 2008 had an Oil and Grease result of Not Detectable. The following three months each had Oil and Grease

results of Not Detectable. The corrective action stated the permittee conducted a housekeeping survey and the additional sampling and analysis, all of which resulted in no detection of Oil and Grease.

B. Inspections

The last water permit routine LDEQ Compliance Evaluation Inspection (CEI) was performed on August 17, 2004. The only observation noted in the inspection report was the color of the discharge from Outfall 001 being light brown.

C. Compliance History

There are no open, appealed, or pending water enforcement actions as of July 15, 2009.

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrated two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities, and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.

X. "IT" Questions - Applicant's Responses

Targa Louisiana Field Services, LLC, Gillis Gas Processing Plant is a minor facility, therefore, IT Questions were not required to be submitted.

XI. ENDANGERED SPECIES

The receiving waterbody, Subsegment 030702 of the Calcasieu River Basin, has not been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for any species, which are listed federally as a threatened species. Also, this type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species, or the critical habitat.

XII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or

eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

~~**XIII. Tentative Determination:**~~

On the basis of preliminary staff review, the Louisiana Department of Environmental Quality has made a tentative determination to re-issue a permit for the discharges described in the application.

XIV. Variances:

No requests for variances have been received by this Office.

XV. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public Notice published in:

Local Newspaper of general circulation;

Office of Environmental Services Public Notice Mailing List.

XVI. Stormwater Pollution Prevention Plan (SWP3) Requirement:

In accordance with LAC 33:IX.2707.I.3 and LAC 33:IX.2707.I.4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. **For first time permit issuance,** the Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the Part II condition requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].